

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF \_\_\_\_\_  
\_\_\_\_\_ DIVISION

*(Write the District and Division, if any, of the  
court in which the complaint is filed.)*

ANDREW WILLIAM PANKOTAI,  
PLAINTIFF

*(Write the full name of each plaintiff who is filing  
this complaint. If the names of all the plaintiffs  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)*

**-against-**

1) NORTHUMBERLAND COUNTY  
COURTHOUSE, 2) NORTHUMBER-  
-LAND JUDGE WM. HARVEY  
"SEE ATTACHED"

*(Write the full name of each defendant who is being  
sued. If the names of all the defendants cannot fit  
in the space above, please write "see attached" in  
the space and attach an additional page with the  
full list of names.)*

**Complaint for a Civil Case**

**4 : CV 16-0004**  
Case No. \_\_\_\_\_

*(to be filled in by the Clerk's Office)*

Jury Trial: ☒ Yes ☐ No  
*(check one)*

FILED  
WILLIAMSPORT  
JAN 4 2016  
PER 09  
DEPUTY CLERK

Continued Full List of Defendants

Attachment "A"

- Wiest, 3) Northumberland County Assistant District Attorney William Cole, and 4) Attorney Kathleen Anne Lincoln.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>ANDREW WILLIAM PANKOTAI</u>
Street Address	<u>319 EAST SEVENTH STREET</u>
City and County	<u>MOUNT CARMEL, NORTHUMBERLAND</u>
State and Zip Code	<u>PENNSYLVANIA 17851</u>
Telephone Number	<u>570-540-1259</u>
E-mail Address	<u>d.pankotai5760@live.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>NORTHUMBERLAND CO. COURTS</u>
Job or Title (if known)	<u></u>
Street Address	<u>201 MARKET STREET, 2nd FL.</u>
City and County	<u>SUNBURY, NORTHUMBERLAND</u>
State and Zip Code	<u>PENNSYLVANIA 17801</u>
Telephone Number	<u>570-988-4167</u>
E-mail Address (if known)	<u></u>

**Defendant No. 2**

Name	<u>NORTHUMBERLAND CO. JUDGE</u>
Job or Title (if known)	<u>JUDGE WM. HARVY WEIST</u>
Street Address	<u>201 MARKET STREET, 2nd FL.</u>
City and County	<u>SUNBURY, NORTHUMBERLAND</u>

State and Zip Code PENNSYLVANIA, 17801  
 Telephone Number 570-988-4167  
 E-mail Address \_\_\_\_\_  
 (if known) \_\_\_\_\_

Defendant No. 3

Name WILLIAM COLE  
 Job or Title ASSISTANT DISTRICT ATTORNEY  
 (if known) NORTHUMBERLAND COUNTY  
 Street Address 201 MARKET STREET, 2ND FL.  
 City and County SUNBURY, NORTHUMBERLAND  
 State and Zip Code PENNSYLVANIA, 17801  
 Telephone Number 570-988-4135  
 E-mail Address \_\_\_\_\_  
 (if known) \_\_\_\_\_

Defendant No. 4

Name KATHLEEN ANNE LINCOLN  
 Job or Title PLAINTIFF'S DEFENCE COUNSEL  
 (if known) \_\_\_\_\_  
 Street Address 1001 1/2 PENNSYLVANIA AVE.  
 City and County SUNBURY, NORTHUMBERLAND  
 State and Zip Code PENNSYLVANIA, 17801  
 Telephone Number 570-988-4170 or 570-490-3147  
 E-mail Address \_\_\_\_\_  
 (if known) \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

8<sup>TH</sup> AMENDMENT OF U.S. CONSTITUTION  
2008-011023, THE PEOPLE, ETC., Respondent,  
v Terry E. Grant, appellant. (Ind. No. 1432/06)

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) ANDREW W. PANKOTAI is a citizen of  
the State of (name) PENNSYLVANIA.

b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name)  
\_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

Continued List of Defendants (Individual)

Attachment "B"

c. If the defendant is a corporation

The defendant, (name) NORTHUMBERLAND CO. COURTHOUSE is incorporated under the laws of the State (name) PENNSYLVANIA, and has its principal place of business in the State of (name) PENNSYLVANIA.

d. If the defendant is an individual

NORTHUMBERLAND CO.  
The defendant, (name) ASSISTANT D.A. WILLIAM COLE, is a citizen of the State of (name) PENNSYLVANIA.

e. If the defendant is an individual

The defendant, (name) NORTHUMBERLAND JUDGE WIEST, is a citizen of the State of (name) PENNSYLVANIA.

e. If the defendant is an individual

The defendant, (name) ATTORNEY KATHLEEN LINCOLN, is a citizen of the State of (name) PENNSYLVANIA.

b. If the defendant is a corporation

NORTHUMBERLAND CO.  
The defendant, (name) COURTHOUSE, is  
incorporated under the laws of the State of (name)  
PENNSYLVANIA, and has its principal place of  
business in the State of (name) PENNSYLVANIA. Or is  
incorporated under the laws of (foreign  
nation) \_\_\_\_\_, and has its principal place of  
business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

THE PLAINTIFF REQUEST DEFENDANT PAY  
\$100,000.00 FOR BAIL REVOCATION

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. ALL DEFENDANTS WERE INVOLVED BY THREATENING  
TO TAKE MY BAIL AWAY (REVOCATE) IF I DID NOT PLEA  
GUITY. THIS VIOLATES MY RIGHTS. AT COURTHOUSE ON 11/9/15

2. ALL DEFENDANTS WERE INVOLVED BY KNOWING  
I WAS UNDER THE CARE OF A DOCTOR AND RECEIVED...

(SEE ATTACHMENT)

"Continued Statement of Claim"

Attachment "C"

NARCOTICS WHICH IMPAIRED MY JUDGEMENT AND TO TAKE  
BAIL AWAY IF I DIDN'T SHOW. I DID SHOW UP UNDER THE  
INFLUENCE AND COULD NOT MAKE A VOLUNTARY PLEA.  
TOOK PLACE AT COURTHOUSE ON NOVEMBER 9, 2015.

---

---

---

---



**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

PLAINTIFF REQUEST GUILTY PLEA BE PULLED AND  
REINSTATEMENT OF BAIL OF UNSECURE. PLAINTIFF  
REQUEST \$100,000.00 DOLLARS IF BAIL IS SECURED.  
PLAINTIFF REQUEST DISMISSAL OF ALLEGED, DUE TO  
MULTIPLE VIOLATION OF RIGHTS . CHARGES

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/04, 2016

Signature of Plaintiff

Printed Name of Plaintiff

Andrew-William: Pankotai  
Andrew-WILLIAM: Pankotai  
319 East 7th Street  
Mount Carmel, PA 17851

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.